



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**AUG 23 2012**

Ms. Martie Schramm  
District Ranger  
Kaibab National Forest  
Attention: Bill Williams Mountain Restoration Project  
742 South Clover Road  
Williams, Arizona 86046

Subject: Draft Environmental Impact Statement for the Bill Williams Mountain Restoration Project,  
Coconino County, Arizona (CEQ# 20120225)

Dear Ms. Schramm:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Bill Williams Mountain Restoration Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA commends the Forest Service for the commitment demonstrated in the Bill Williams Mountain Restoration Project (Project) to restore and sustainably manage the ponderosa pine and mixed conifer forests on Bill Williams Mountain. We strongly support the restoration goals for this Project, as well as those developed for the broader Four Forest Restoration Initiative, the landscape-scale planning effort to restore 2.4 million acres of forest lands in northern Arizona.

Based on our review of the DEIS, we have rated the preferred alternative and the document as LO-1, Lack of Objections – Adequate (see enclosed EPA Rating Definitions). The EPA recognizes the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. We commend the Forest Service for committing, in the preferred alternative, to strong best management practices and soil and water conservation practices to protect sensitive resources during mechanical harvest and fire treatments. We would also like to acknowledge the thorough description, in the DEIS, of the possible effects of climate change on the Project, and the commitment, through the preferred alternative, to mitigate those effects.

We recognize the challenge the Forest Service faces by implementing a management plan that will rely heavily on prescribed burns and wildfire to achieve restoration objectives. Though the planning area has good air quality, and meets all federal ambient air quality standards, the fine particulate matter generated during wildland fire can present a human health risk. We recommend that the Forest Service implement BMPs and work with the interagency Smoke Management Group to reduce emissions from prescribed burns and wildfires to the greatest possible extent.

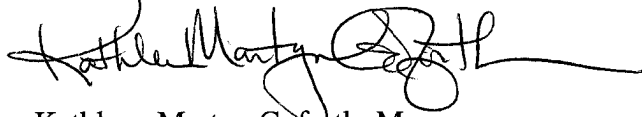
One aspect of the Project that gives us pause is the planned use of cable logging within the Arizona Bughane Botanical Area. The DEIS states that the disturbance associated with cable logging within the Botanical Area could disrupt the microclimate and may adversely affect the Arizona bugbane population (p. 243). Additionally, the DEIS states that the anticipated disruption of the microclimate, coupled with

projected future warming of the planning area, could contribute to a trend toward federal listing of the species (p. 244). We recommend that the Forest Service refrain from the use of cable logging within the Botanical Area unless mitigation measures could be developed that would ensure long-term protection of the Arizona bugbane population.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. Please note that starting October 1, 2012, EPA Headquarters will not accept paper copies or CDs of EISs for official filing purposes. Submissions on or after October 1, 2012, must be made through the EPA's new electronic EIS submittal tool: *e-NEPA*. To begin using *e-NEPA*, you must first register with the EPA's electronic reporting site - [https://cdx.epa.gov/epa\\_home.asp](https://cdx.epa.gov/epa_home.asp). Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at 415-947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Martyn Goforth', with a long horizontal flourish extending to the right.

Kathleen Martyn Goforth, Manager  
Environmental Review Office

Enclosure: Summary of the EPA Rating System

# **SUMMARY OF EPA RATING DEFINITIONS\***

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

## **ENVIRONMENTAL IMPACT OF THE ACTION**

### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

## **ADEQUACY OF THE IMPACT STATEMENT**

### ***"Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

### ***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

### ***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

